

**Federally Enforceable State
Operating Permit (FESOP) Renewal
Indiana Department of Environmental Management
Office Of Air Quality
and
City of Indianapolis
Office of Environmental Services**

**The Kroger Company-Indianapolis Bakery
6801 English Avenue
Indianapolis, Indiana 46219**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F097-14050-00161	
Issued by: John B. Chavez, Administrator Office of Environmental Services	Issuance Date: Expiration Date:

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- D.3.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-5(a)]

Certification Form
Emergency Occurrence Form
Quarterly Report Form
Quarterly Deviation and Compliance Monitoring Report Form
Natural Gas Fired Boiler Certification

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application

A.1 General Information [326 IAC 2-8-4]

The Permittee owns and operates a bakery.

Authorized individual: General Manger
Source Address: 6801 English Avenue, Indianapolis, IN 46219
Mailing Address: 6801 English Avenue, Indianapolis, IN 46219
SIC Code: 2051
County Location: Marion
County Status: Attainment for all criteria pollutants
Source Status: Minor Source, FESOP Program
PSD Synthetic Minor Source

A.2 Emission Units and Pollution Control Summary [326 IAC 2-8-4]

The stationary source consists of the following emission units and pollution control devices:

- (a) Bread Line #1. Maximum throughput of 4.85 tons of dough per hour. Oven lubricant maximum usage of 20.0 gallons per month. Equipped with one (1) 5.25 million Btu per hour natural gas fired oven. Propane used as emergency backup fuel. Constructed in 1960.
- (b) Bread Line #2. Maximum throughput of 4.75 tons of dough per hour. Oven lubricant maximum usage of 20.0 gallons per month. Equipped with one (1) 5.25 million Btu per hour natural gas fired oven. Propane used as emergency backup fuel. Constructed in 1960.
- (c) Bun Line #3. Maximum throughput of 3.3 tons of dough per hour. Oven lubricant maximum usage of 20.0 gallons per month. Equipped with one (1) 5.25 million Btu per hour natural gas fired oven. Propane used as emergency backup fuel. Constructed in 1960.
- (d) One (1) natural gas fired boiler identified as Boiler # 2. Maximum heat input of 10.04 million Btu per hour. Propane fired as an emergency backup fuel. Constructed between 1972 & 1983
- (e) One (1) natural gas fired boiler identified as Boiler # 3. Maximum heat input of 10.04 million Btu per hour. Propane fired as an emergency backup fuel. Constructed in 1969.

A.3 Insignificant Activities [326 IAC 2-8-4]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (a) Natural gas combustion units less than 10 million Btu per hour;
- (b) Brazing equipment, cutting torches, soldering equipment and welding equipment not resulting in the emission of HAPs;
- (c) Paved and unpaved roads and parking lots with public access;
- (d) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
- (e) Gasoline emergency generators not exceeding 110 horsepower;
- (f) Oven cleaner;
- (g) Vegetable shortening tank;
- (h) Corn syrup tank;
- (i) Operations cleaners and solvents, that do not exceed 145 gallons usage per 12 months, except if subject to 326 IAC 20-6
- (j) Air make-up units;
- (k) Cake oven #4 maximum process rate (P) of .33 tons per hour (1.75 MMBtu per hour natural gas combustion emissions);
- (l) Cake oven #5 maximum process rate (P) of .33 tons per hour (1.75 MMBtu per hour natural gas combustion emissions);
- (m) Flour handling system;
- (n) Propane tank;
- (o) Parts washer;
- (p) One (1) natural gas fired boiler, 6.7 million Btu per hour
- (q) One (1) natural gas fired Basket Washer (<1 mmBTU per hour)
- (r) Boiler # 1 Natural Gas-fired-6.7 mmBtu per hour
- (s) Boiler # 4 Natural Gas-fired-6.7 mmBtu per hour
- (t) Boiler # 5 Natural Gas-fired-6.7 mmBtu per hour

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and OES for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

(a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, Office of Environmental Services, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

(b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by the Office of Environmental Services.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, and OES within a reasonable time, any information that IDEM, OAQ, and/or OES may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ and OES copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ and/or OES may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided

the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and/or OES on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;

- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
- (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, and/or OES may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ and/or OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and/or OES. IDEM, OAQ and/or OES may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner and/or OES within a reasonable time.

B.14 Emergency Provision [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or OES, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)
or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967
OES
Telephone No.: 317/327-2234
Facsimile No.: 317/327-2274

Failure to notify IDEM, OAQ or OES, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and
City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ and/or OES may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ or OES by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ or OES determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ and/or OES to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ or OES at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ or OES may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and/or OES and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and/or OES on or before the date it is due.
- (2) If IDEM, OAQ and/or OES upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source’s failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ and/or OES takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and OES any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services

Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ and OES in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ and/or OES, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:
Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

~~B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]~~

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable; and
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Opacity shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality Compliance Data Section
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and/or OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The Commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.11 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on April 12, 1996.
- (b) Upon direct notification by IDEM, OAQ and/or OES that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ and OES upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

- (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit a certified, annual emission statement that meets the requirements of 326 IAC 2-6 (Emission Reporting). This annual statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Compliance Data Section
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and/or OES on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period

of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or OES within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and/or OES on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and

emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

- (a) Bread Line #1 (Emission Unit ID BR 1). Maximum throughput of 4.85 tons of dough per hour. Oven lubricant maximum usage of 20.0 gallons per month. Equipped with one (1) 5.25 million Btu per hour natural gas fired oven. Propane used as emergency backup fuel. Installed in 1960.
- (b) Bread Line #2 (Emission Unit ID BR 2). Maximum throughput of 4.75 tons of dough per hour. Oven lubricant maximum usage of 20.0 gallons per month. Equipped with one (1) 5.25 million Btu per hour natural gas fired oven. Propane used as emergency backup fuel. Installed in 1960.
- (c) Bun Line #3 (Emission Unit ID BU 3). Maximum throughput of 3.3 tons of dough per hour. Oven lubricant maximum usage of 20.0 gallons per month. Equipped with one (1) 5.25 million Btu per hour natural gas fired oven. Propane used as emergency backup fuel. Installed in 1960.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4 (1)]

Pursuant to 326 IAC 2-8-4 (1) (FESOP), combined total VOC emissions from Emission Unit ID's BR 1, BR 2, BU 3 and VOC emissions from the use of Chain Lubrication for Emission Unit ID's BR 1, BR 2 and BU 3 shall not exceed 66.0 tons per rolling thirteen (13) consecutive twenty eight (28) day period.

Compliance with Condition D.1.1 shall make the requirements of 326 IAC 2-7

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), PM from the Emission Unit ID's BR 1, BR 2 and BU 3 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

- (a) PM shall not exceed 11.8 pounds per hour for Emission Unit ID BR 1 based on a process weight rate of 4.85 tons per hour
- (b) PM shall not exceed 11.6 pounds per hour for Emission Unit ID BR 2 based on a process weight rate of 4.75 tons per hour
- (c) PM shall not exceed 9.1 pounds per hour for Emission Unit ID BU 3. based on a process weight rate of 3.3 tons per hour

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B.- Preventive Maintenance Plan, of this Permit, is required for Emission Unit ID's BR 1, BR 2 and BU 3.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC limitation contained in Condition D.1.1 shall be determined by:

- a) Actual chain lubrication usage in Emission Unit ID's BR 1, BR 2 and BU 3 per rolling thirteen (13) consecutive twenty eight (28) day production periods; and
- b) Pursuant to the emission factor equation for bakery oven VOC emissions found in "Alternative Control Technology (ACT) Document for Bakery Oven Emissions" 453/R-92-017 for actual bread and bun production per rolling thirteen (13) consecutive twenty eight (28) day production periods. The ACT emission factor utilized for Compliance Determination is:

$$VOC \text{ emission factor} = 0.95(Y_i) + 0.195(t_i) - 0.51(S) - 0.86(t_s) + 1.90$$

where: Y_i = initial baker's % yeast to the nearest tenth of a percent
 t_i = total yeast action time in hours to the nearest tenth of an hour
 S = final (spike) baker's % yeast to the nearest tenth of a percent
 t_s = spiking time in hours to the nearest tenth of an hour

IDEM, OAQ and/or OES reserves the authority to determine compliance using alternate method(s) as approved by the Administrator.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.5 Record Keeping Requirements

To document compliance with Condition D.1.1, the Permittee shall maintain records of date and actual bread and bun production, chain lubrication usage and VOC emissions per rolling thirteen (13) consecutive twenty eight (28) day period. Records maintained shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.1.1.

D.1.6 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting form(s) located at the end of this Permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. Each quarterly report shall consist of, at a minimum, a rolling thirteen (13) consecutive twenty eight (28) day production period VOC emissions total including all completed twenty eight (28) day production periods in the calendar quarter being reported. The quarterly report shall also include the end date of all twenty eight (28) day production periods completed during the quarter.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

- (d) One (1) natural gas fired boiler identified as Boiler # 2. Maximum heat input of 10.04 million Btu per hour. Propane fired as an emergency backup fuel. Constructed between June 8, 1972 and September 21, 1983.
- (e) One (1) natural gas fired boiler identified as Boiler # 3. Maximum heat input of 10.04 million Btu per hour. Propane fired as an emergency backup fuel. Constructed in 1969.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1. Particulate Matter Emissions (PM) [326 IAC 6-2-2]

Pursuant to 326 IAC 6-2-2(a) Particulate emissions from indirect heating facilities constructed prior to September 21, 1983 and located in Marion County, Boiler # 2 and Boiler # 3 shall be limited based on the following equation:

$$Pt = \frac{0.87}{Q^{0.16}}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu per hour) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit, in which case, the capacity specified in the operation permit shall be used.

(a) Pursuant to 326 IAC 6-2-2(c) Boiler # 2, with a Q = 20.08, Pt shall not exceed 0.54 pounds per mmBtu

(b) Pursuant to 326 IAC 6-2-2(b) Boiler # 3, with a Q = 10.04, Pt shall not exceed 0.60 pounds per mmBtu

D.2.2 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted using the attached natural gas fired boiler certification to the address listed in Section C - General Reporting Requirements, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.3 FACILITY OPERATION CONDITIONS

Insignificant Activities

Facility Description [326 IAC 2-8-4(10)]

Boiler # 1 Natural Gas-fired-6.7 MMBtu per hour constructed after September 21,1983
Boiler # 4 Natural Gas-fired-6.7 MMBtu per hour constructed after September 21,1983
Boiler # 5 Natural Gas-fired-6.7 MMBtu per hour constructed after September 21,1983
Degreasing Operations Cleaners and solvents, that do not exceed 145 gallons usage per 12 months, except if subject to 326 IAC 20-6 Constructed prior to 1980
Cake oven #4 maximum process rate (P) of .33 tons per hour (1.75 MMBtu per hour natural gas combustion emissions)
Cake oven #5 maximum process rate (P) of .33 tons per hour (1.75 MMBtu per hour natural gas combustion emissions)
Brazing equipment, cutting torches, soldering equipment and welding equipment not resulting in the emission of HAPs;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating, PM emissions from Boiler # 1, # 4 and # 5 shall each be limited to 0.4 pounds per million BTU of heat input.

D.3.2 Particulate Matter (PM) [326 IAC 6-3]

(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from Cake Oven # 4 and Cake Oven # 5 shall each not exceed the allowable PM emission rate for dough usage based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

For Cake Oven # 4, E shall not exceed; 2.0 pounds PM per hour Where P= .33 tons per hour

For Cake Oven # 5, E shall not exceed; 2.0 pounds PM per hour Where P= .33 tons per hour

(b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate for Brazing equipment, cutting torches, soldering equipment and welding equipment shall not exceed the allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.4 Volatile Organic Compounds (VOC) 326 IAC 8-3-5(a)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility existing prior to January 1, 1980 shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32)

millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):

- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
and
CITY OF INDIANAPOLIS
OFFICE of ENVIRONMENTAL SERVICES**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: The Kroger Company-Indianapolis Bakery
Source Address: 6801 English Avenue, Indianapolis, IN 46219
Mailing Address: 6801 English Avenue, Indianapolis, IN 46219
FESOP Permit No.: F097-14050-00161

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: _____

Printed Name: _____

Title/Position: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967
CITY OF INDIANAPOLIS
OFFICE of ENVIRONMENTAL SERVICES
DATA COMPLIANCE
2700 South Belmont Avenue
Indianapolis, Indiana 46221
Phone:317-327-2234
Fax:317-327-2274**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: The Kroger Company-Indianapolis Bakery
Source Address: 6801 English Avenue, Indianapolis, IN 46219
Mailing Address: 6801 English Avenue, Indianapolis, IN 46219
FESOP Permit No.: F097-14050-00161

This form consists of 2 pages Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
cThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
cThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and
 CITY OF INDIANAPOLIS
 OFFICE of ENVIRONMENTAL SERVICES**

FESOP Quarterly Report

Source Name: The Kroger Company-Indianapolis Bakery
 Source Address: 6801 English Avenue, Indianapolis, IN 46219
 Mailing Address: 6801 English Avenue, Indianapolis, IN 46219
 FESOP Permit No.: F097-14050-00166

Facility: Ovens # 1, # 2 and # 3 and Chain Lubrication Usage
 Parameter: VOC Emissions
 Limit: 66.0 tons VOC per rolling thirteen (13) consecutive twenty eight (28) day period;

QUARTER _____ YEAR: _____

4-Week Period Ending Date	Oven # 1 VOC 4-Week Period Total (tons VOC)	Oven # 2 VOC 4-Week Period Total (tons VOC)	Oven # 3 VOC 4-Week Period Total (tons VOC)	Chain Lubrication Usage (gallons)	Thirteen 4-Week Period Rolling Total (tons VOC)
TOTAL					

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and
 CITY OF INDIANAPOLIS
 OFFICE of ENVIRONMENTAL SERVICES**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: The Kroger Company-Indianapolis Bakery
 Source Address: 6801 English Avenue, Indianapolis, IN 46219
 Mailing Address: 6801 English Avenue, Indianapolis, IN 46219
 FESOP Permit No.: F097-14050-00161

Months: _____ to _____ Year: _____ Page 1 of 2

<p>This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<p>9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p>9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
CITY OF INDIANAPOLIS
OFFICE of ENVIRONMENTAL SERVICES**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: The Kroger Company-Indianapolis Bakery
Source Address: 6801 English Avenue, Indianapolis, IN 46219
Mailing Address: 6801 English Avenue, Indianapolis, IN 46219
FESOP Permit No.: F097-14050-00161

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel
FromTo

Days burning alternate fuel

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality
and
Indianapolis Office of Environmental Services**

Addendum to the Technical Support Document (TSD) for a Federally Enforceable State
Operating Permit (FESOP) Renewal

Source Name: The Kroger Company - Indianapolis Bakery
Source Location: 6801 English Avenue, Indianapolis, IN 46219
County: Marion
SIC Code: 2051
Operation Permit No.: F097-14050-00161
Permit Reviewer: Warner Waters

On April 30, 2002, the Office of Air Quality (OAQ) and Office of Environmental Services (OES) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that the Kroger Company - Indianapolis Bakery had applied for a FESOP to operate a bakery. The notice also stated that OAQ and OES proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

The following changes were made to the Kroger Company - Indianapolis Bakery FESOP (Deletions in strikethrough, additions are in boldface type):

Change 1:

The cover page signature block was changed as follows:

Operation Permit No.: F097-14050-00161	
Issued by:	Issuance Date:
John B. Chavez, Administrator Office of Environmental Services	Expiration Date:

Change 2:

The following changes were made to the Table of Contents.

~~C. 15 Compliance Response Plan Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]~~

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services**

Technical Support Document (TSD) for a Federally Enforceable State
Operating Permit (FESOP) Renewal

Source Background and Description

Source Name: The Kroger Company - Indianapolis Bakery
Source Location: 6801 English Avenue, Indianapolis, IN 46219
County: Marion
SIC Code: 2051
Operation Permit No.: F097-14050-00161
Permit Reviewer: Warner Waters

The Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) have reviewed a FESOP renewal application from the Kroger Company Indianapolis Bakery relating to the operation of their bread baking facility. Kroger Company Indianapolis Bakery was issued FESOP F097-5737-00266 on December 12, 1996.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Bread Line #1. Maximum throughput of 4.85 tons of dough per hour. Oven lubricant maximum usage of 20.0 gallons per month. Equipped with one (1) 5.25 million Btu per hour natural gas fired oven. Propane used as emergency backup fuel. Constructed in 1960.
- (b) Bread Line #2. Maximum throughput of 4.75 tons of dough per hour. Oven lubricant maximum usage of 20.0 gallons per month. Equipped with one (1) 5.25 million Btu per hour natural gas fired oven. Propane used as emergency backup fuel. Constructed in 1960.
- (c) Bun Line #3. Maximum throughput of 3.3 tons of dough per hour. Oven lubricant maximum usage of 20.0 gallons per month. Equipped with one (1) 5.25 million Btu per hour natural gas fired oven. Propane used as emergency backup fuel. Constructed in 1960.
- (d) One (1) natural gas fired boiler identified as Boiler # 2. Maximum heat input of 10.04 million Btu per hour. Propane fired as an emergency backup fuel. Constructed between 1972 & 1983
- (e) One (1) natural gas fired boiler identified as Boiler # 3. Maximum heat input of 10.04 million Btu per hour. Propane fired as an emergency backup fuel. Constructed in 1969.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Brazing equipment, cutting torches, soldering equipment and welding equipment not resulting in the emission of HAPs;
- (b) Paved and unpaved roads and parking lots with public access;
- (c) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
- (d) Gasoline emergency generators not exceeding 110 horsepower;
- (e) Oven cleaner;
- (f) Vegetable shortening tank;
- (g) Corn syrup tank;
- (h) Cleaners and solvents, that do not exceed 145 gallons usage per 12 months, except if subject to 326 IAC 20-6
- (i) Air make-up units;
- (j) Cake oven #4 maximum process rate (P) of .33 tons per hour (1.75 MMBtu/hr natural gas combustion emissions);
- (k) Cake oven #5 maximum process rate (P) of .33 tons per hour (1.75 MMBtu/hr natural gas combustion emissions);
- (l) Flour handling system;
- (m) Propane tank;
- (n) Parts washer;
- (o) One (1) natural gas fired Basket Washer (<1 mmBTU/hr)
- (p) Boiler # 1 Natural Gas-fired-6.7 mmBtu/hr constructed after September 21, 1983
- (r) Boiler # 4 Natural Gas-fired-6.7 mmBtu/hr constructed after September 21, 1983
- (s) Boiler # 5 Natural Gas-fired-6.7 mmBtu/hr constructed after September 21, 1983
- (t) Degreasing Operations Cleaners and solvents, that do not exceed 145 gallons usage per 12 months, except if subject to 326 IAC 20-6

Existing Approvals

- (a) FESOP F097-5737-00161, issued on December 12, 1996.
- (a) First Minor Permit Modification, MMF097-9078-00161, issued on March 6, 1998, and
- (b) First Administrative Amendment, AAF097-10491, issued on January 14, 1999

All conditions from previous approvals were incorporated into this FESOP.

Enforcement Issue

There are no enforcement actions pending

Recommendation

The staff recommends to the Administrator that the FESOP be approved. This recommendation is based on the following facts and conditions:
Unless otherwise stated, information, used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on March 9, 2001.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP. Unrestricted potential emission based on data provided by application.

Pollutant	PTE (tons per year)
PM	0.54
PM-10	0.54
SO ₂	0.06
VOC	132.3
CO	3.02
NO _x	12.06

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP	PTE (tons/year)
for any single HAP	Negligible
For total HAP	Negligible

The potential to emit (as defined in the Indiana Rule) of VOCs are greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7-1.

Potential to Emit After Issuance

The source was issued a FESOP on December 12, 1996 and has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP (F097-5737-00161; issued on December 12, 1996).

Process/ facility	Potential to Emit After Issuance (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Bread Line #1	0.12	0.12	0.2	28.01	0.48	2.32	Negligible
Bread Line #2	0.12	0.12	0.2	20.95	0.48	2.32	Negligible
Bun Line #3	0.12	0.12	0.2	16.94	0.48	2.32	Negligible
Boiler #2	0.24	0.24	0.44	0.34	1.69	6.2	Negligible
Boiler #3	0.24	0.24	0.44	0.34	1.69	6.2	Negligible
Insignificant Activities	10.0	10.0	10.0	10.0	10.0	10.0	Negligible
Total Emissions	10.84	10.84	11.48	76.58	14.82	29.36	Negligible

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	unclassifiable
SO ₂	maintenance attainment
OZONE	maintenance attainment
CO	attainment
NO ₂	attainment
Lead	unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

326 IAC 12 (New Source Performance Standard)

The Kroger Company-Indianapolis Bakery is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.4, Subpart Dc), because the boilers were constructed prior to June 9, 1989.

326 IAC 20 Hazardous Air Pollutants

There are no 40CFR Part 63 provisions that apply to this source. Subpart T is not applicable because the degreaser does not use a halogenated solvent.

State Rule Applicability Entire Source

326 IAC 2-2 Prevention of Significant Deterioration Requirements

The unrestricted potential to emit any regulated pollutant does not exceed 250 tons per year, the source is not on the list of 28 source categories under 326IAC 2-2-1(p), and no significant modifications were made pursuant to 326 IAC 2-2. Therefore 326 IAC 2-2 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year NO_x and VOC in Marion county. Pursuant to this rule, the owner/operator of the source must submit an emission statement for the source. The statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6 (April 15 of each year) and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8).

326 IAC 2-8-4 (1) (FESOP)

The source is producing a wide variety of bread products each with widely varying ethanol emission rates entirely dependent on the percent of initial and final (spike) baker's yeast. The production schedule is on a 28 day production cycle. The source operates 24 hours a day and often times baking of an individual product can not be attributed to a daily emission rate for that product. The initial FESOP F097-5737-00161 issued December 12, 1996 contained fixed monthly emission rates which often contained thirty or thirty one day reporting periods. This presented logistical reporting problems for the source. IDEM OAQ and OES agreed to revise the existing FESOP with the First Minor Permit Modification, MMF097-9078-00161, issued on March 6, 1998 to reporting on a 28 day production period.

The source will calculate ethanol emissions using a "spreadsheet" approach rather than a fixed worst case emission factor for all bread products due to the wide fluctuations in baker's yeast and yeast action time. The use of chain lubrication has minimal VOC emissions but should be included in actual oven VOC emissions.

Pursuant to the emission factor equation for bakery oven VOC emissions found in "Alternative Control Technology (ACT) Document for Bakery Oven Emissions" 453/R-92-017 for actual bread and bun production, per rolling thirteen (13) consecutive twenty eight (28) day production periods, the ACT emission factor utilized for Compliance Determination is:

$$\text{VOC emission factor} = 0.95(Y_i) + 0.195(t_i) - 0.51(S) - 0.86(t_s) + 1.90$$

where: Y_i = initial baker's % yeast to the nearest tenth of a percent
 t_i = total yeast action time in hours to the nearest tenth of an hour
 S = final (spike) baker's % yeast to the nearest tenth of a percent
 t_s = spiking time in hours to the nearest tenth of an hour

IDEM, OAQ and/or ERMD reserves the authority to determine compliance using alternate method(s) as approved by the Administrator.

Therefore, combined total VOC emissions from Emission Unit ID's BR 1, BR 2, BU 3 and VOC emissions from the use of Chain Lubrication for Emission Unit ID's BR 1, BR 2 and BU 3 shall not exceed 66.0 tons per rolling thirteen (13) consecutive twenty eight (28) day period such that 326 IAC 2-7(Part 70 Permit Program) does not apply.

326 IAC 2-4.1-1(New Source Toxics Control)

Any owner or operator who constructs or reconstructs a major source of hazardous air pollutants which predates the July 27, 1997, as defined in 40 CFR 63.41, including owners or operators with permit applications pending with the department on the effective date of this section, shall comply with the requirements of this section, except as specifically specified in 326 IAC 2-4.1-1.

This source was constructed prior to 7-27-97 and has not constructed a HAP source facility that emits 10 tons per year of any single hazardous air pollutants or 25 tons per year of any combination of hazardous air pollutants, therefore 326 IAC 2-4.1 does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-1-1 Applicability

The source does not have the potential to emit one hundred (100) tons or more and has actual emissions of less than ten (10) tons of particulate matter per year. Therefore 326 IAC 6-1-1 does not apply to this source.

State Rule Applicability- Individual Facilities

Degreaser- Insignificant Activity

326 IAC 8-3 Applicability

The Kroger Company-Indianapolis Bakery was an existing facility prior to January 1, 1980, performing an organic solvent degreasing operation located in Marion County. The source has potential emissions of ninety and seven-tenths (90.7) megagrams (one hundred (100) tons) or greater per year of VOC's. Therefore 326 IAC 8-3-2 is applicable. In addition, 326 IAC 8-3-5 applies because the source was existing as of July 1, 1990.

326 IAC 8-3-2 Cold cleaner operation

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 Cold cleaner degreaser operation and control

- (a) The owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
 - (B) the solvent is agitated; or
 - (C) the solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) The owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Boilers

326 IAC 6-2-2 Emission limitation for facilities specified in 326 IAC 6-2-1(b)

Pursuant to 326 IAC 6-2-2 Boiler # 2 was constructed prior to September 21, 1983 and after June 8 1972, therefore 326 IAC 6-2-1(a) and (c) apply. Boiler #3 was constructed and in operation before June 8,1972 therefore (a) and (b) apply. Boiler # 2 and Boiler # 3 shall be limited based on the following equation:

$$Pt = \frac{0.87}{Q^{0.16}}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input.

Q =Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input.

The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit, in which case, the capacity specified in the operation permit shall be used.

- (a) Pursuant to 326 IAC 6-2-2(c) Boiler # 2, with a Q = 20.08, Pt shall not exceed 0.54 pounds per mmBtu

The potential to emit for Boiler # 2 is 0.53 pounds of particulate matter per million BTU therefore the boiler is in compliance with 326IAC 6-2-2b

- (b) Pursuant to 326 IAC 6-2-2(b) Boiler # 3, with a Q = 10.04, Pt shall not exceed 0.60 pounds per mmBtu

The potential to emit for Boiler # 3 is 0.55 pounds of particulate matter per million BTU therefore the boiler is in compliance with 326IAC 6-2-2c

326 IAC 6-2-4 Emission limitations for facilities specified in 326 IAC 6-2-1(d)

Pursuant to 326 IAC 6-2-2(a) Particulate emissions from indirect heating facilities constructed after September 21, 1983 and located in Marion County, Boiler # 1,Boiler # 4 and Boiler# 5 each shall be limited based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input.

The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

Pursuant to 326 IAC 6-2-4 Boiler #1,#4,#5 with a Q =40.18, Pt each shall not exceed 0.4 lb/mmBtu per boiler

Ovens

There are no emission factors under AP-42 for particulate matter from the baking process, the particulate matter is from the combustion of natural gas.

326 IAC 6-3 applies because baking in the ovens is considered a process operation which emits particulate matter.

326 IAC 6-3-2(c) Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2(c), PM from the Emission Unit ID's BR 1, BR 2 and BU 3 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (a) PM shall not exceed 11.8 pounds per hour for Emission Unit ID BR 1 based on a process weight rate of 4.85 tons per hour
- (b) PM shall not exceed 11.6 pounds per hour for Emission Unit ID BR 2 based on a process weight rate of 4.75 tons per hour
- (c) PM shall not exceed 9.1 pounds per hour for Emission Unit ID BU 3. based on a process weight rate of 3.3 tons per hour

These potential emission rates demonstrate that the ovens should be in compliance with 326 IAC 6-3-2 at all times.

326 IAC 8-1-6 New facilities; general reduction requirements

326 IAC 8-1-6 is not applicable because each oven in the Kroger Company Indianapolis Bakery was existing prior to January 1, 1980.

326 IAC 8-6-1 Applicability

326 IAC 8-6-1 (1) is applicable to the Kroger Company Indianapolis Bakery because the bakery was in existence prior to January 1, 1980 and VOC emissions exceeded 100 tons per year. However, there was no previously known VOC emission estimate for bakeries until EPA approved an emission factor estimation for bakeries in 1992 in the document "Alternative Control Technology (ACT) Document for Bakery Oven Emissions" 453/R-92-017. The source was required to submit a Part 70 or FESOP application and choose to limit VOC emissions such that 326 IAC 8-6-1 and 326 IAC 2-7 do not apply. The source is renewing it's FESOP with this review.

Welding

326 IAC 6-3 (Process Operations),

Pursuant to 326 IAC 6-3 The allowable PM emission rate for Brazing equipment, cutting torches, soldering equipment and welding equipment each shall not exceed the allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour;and} \\ P = \text{process weight rate in tons per hour}$$

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the

source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

All compliance requirements from previous approvals were incorporated into this FESOP.

The Compliance Determination Requirements of Section D in the permit requires VOC limitation based on usage. Compliance Determination Requirements are sufficient to demonstrate continuous compliance, therefore they will not be supplemented with Compliance Monitoring Requirements.

Conclusion

The operation of this bread bakery will be subject to the conditions of the attached proposed FESOP No. F097-14050-00161.

Kroger Company-Indianapolis Bakery

Proposed VOC Emissions from Bread Line #1

$$\text{VOC tons/yr} = \text{VOC ef} \times \text{BP} \times \text{K}(1-F)$$

VOC tons/yr = VOC emissions in tons per year

emission factor in pounds of uncontrolled VOC emissions per ton of bread or other

VOC ef = yeast leavened product produced

BP = bread or other yeast leavened product production, in tons per year

K = conversion constant in tons per 2000 pounds

F = fraction of VOC emission being reduced by a control device

The value for VOC ef can be estimated for each yeast leavened product by using the following equation:

$$\text{VOCef} = 0.95 Y_i + 0.195 T_i - 0.51 S - 0.86 T_s + 1.90$$

Y_i = initial baker's percent yeast to the nearest 1/10 of a percent

T_i = total yeast action time of initial yeast in hours to the nearest 1/10 of an hour

S = final spike of yeast in baker's % to the nearest 1/10 of a percent

T_s = spiking yeast action time in hours to the nearest 1/10 of an hour

$$Y_i = 0.95 * 2.0 \quad 1.9$$

$$T_i = 0.195 * 1.5 \quad 0.2925$$

$$S = 0.51 * 1.37 \quad 0.6987$$

$$T_s = 0.86 * 1.33 \quad 1.1438$$

$$\text{VOCef} = 2.25 \text{ pounds of ethanol per ton product}$$

VOC ef = 2.25 lb/ton average. Worst case = 3.10 lb VOC per ton product

BP = 17550 tons/yr

K = 0.0005 ton/lb

F = 0

Total VOC = 27.2 tons per year

Kroger Company-Indianapolis Bakery

Proposed VOC Emissions from Bread Line #2

$$\text{VOC tons/yr} = \text{VOC ef} \times \text{BP} \times \text{K}(1-F)$$

VOC tons/yr = VOC emissions in tons per year

emission factor in pounds of uncontrolled VOC emissions per ton of bread or other

VOC ef = yeast leavened product produced

BP = bread or other yeast leavened product production, in tons per year

K = conversion constant in tons per 2000 pounds

F = fraction of VOC emission being reduced by a control device

The value for VOC ef can be estimated for each yeast leavened product by using the following equation:

$$\text{VOCef} = 0.95 Y_i + 0.195 T_i - 0.51 S - 0.86 T_s + 1.90$$

Y_i = initial baker's percent yeast to the nearest 1/10 of a percent

T_i = total yeast action time of initial yeast in hours to the nearest 1/10 of an hour

S = final spike of yeast in baker's % to the nearest 1/10 of a percent

T_s = spiking yeast action time in hours to the nearest 1/10 of an hour

$$Y_i = 0.95 * 2.0 = 1.9$$

$$T_i = 0.195 * 1.5 = 0.2925$$

$$S = 0.51 * 2.42 = 1.2342$$

$$T_s = 0.86 * 1.33 = 1.1438$$

$$\text{VOCef} = 1.87 \text{ pounds of ethanol per ton product}$$

VOC ef = 1.87 lb/ton average. Worst case = 3.10 lb VOC per ton product

BP = 13000 tons/yr

K = 0.0005 ton/lb

F = 0

Total VOC = 20.17 tons per year

Kroger Company-Indianapolis Bakery

Proposed VOC Emissions from Bun Line #3

$$\text{VOC tons/yr} = \text{VOC ef} \times \text{BP} \times \text{K}(1-F)$$

VOC tons/yr = VOC emissions in tons per year

emission factor in pounds of uncontrolled VOC emissions per ton of bread or other

VOC ef = yeast leavened product produced

BP = bread or other yeast leavened product production, in tons per year

K = conversion constant in tons per 2000 pounds

F = fraction of VOC emission being reduced by a control device

The value for VOC ef can be estimated for each yeast leavened product by using the following equation:

$$\text{VOCef} = 0.95 Y_i + 0.195 T_i - 0.51 S - 0.86 T_s + 1.90$$

Y_i = initial baker's percent yeast to the nearest 1/10 of a percent

T_i = total yeast action time of initial yeast in hours to the nearest 1/10 of an hour

S = final spike of yeast in baker's % to the nearest 1/10 of a percent

T_s = spiking yeast action time in hours to the nearest 1/10 of an hour

$$Y_i = 0.95 * 2.0 = 1.9$$

$$T_i = 0.195 * 1.5 = 0.2925$$

$$S = 0.51 * 2.25 = 1.3005$$

$$T_s = 0.86 * 1.33 = 1.1438$$

$$\text{VOCef} = 1.69 \text{ pounds of ethanol per ton product}$$

VOC ef = 1.69 lb/ton average. Worst case = 3.10 lb VOC per ton product

BP = 13000 tons/yr

K = 0.0005 ton/lb

F = 0

Total VOC = 16.16 tons per year

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
10 < MM BTU/HR <100**

Boiler #2

**Company Name: Kroger Company-Indianapolis Bakery
Address City IN Zip: 6801 English Avenue
CP: 97-5737
Plt ID: 097-00266
Reviewer: MBC
Date: 12/11/96**

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

10.0

88.0

Pollutant

Emission Factor in lb/MMCF	PM	PM10	SO2	NOx	VOC	CO
	13.7	13.7	0.6	140.0	2.8	35.0
Potential Emission in tons/yr	0.6	0.6	0.0	6.2	0.1	1.5

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: Uncontrolled = 140, Low NOx Burner = 81, Flue gas recirculation = 30

Emission Factors for CO: Uncontrolled = 35, Low NOx Burner = 61, Flue gas recirculation = 37

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Allowable PM limit(s) from 326 IAC 6-2-2 where $P_t = 0.87 / Q^{0.16}$

Q = total source heat input(in MMBtu/hr) and $Q = 10.04 + 10.04 = 20.08$ MMBtu/hr

allowable PM = $P_t = 0.87 / Q^{0.16} = 0.53$ lbs PM / MMBtu

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
10 < MM BTU/HR <100**

Boiler #3

**Company Name: Kroger Company-Indianapolis Bakery
Address City IN Zip: 6801 English Avenue
CP: 97-5737
Plt ID: 097-00266
Reviewer: MBC
Date: 12/11/96**

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

10.0

88.0

Emission Factor in lb/MMCF	Pollutant					
	PM 13.7	PM10 13.7	SO2 0.6	NOx 140.0	VOC 2.8	CO 35.0
Potential Emission in tons/yr	0.6	0.6	0.0	6.2	0.1	1.5

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: Uncontrolled = 140, Low NOx Burner = 81, Flue gas recirculation = 30

Emission Factors for CO: Uncontrolled = 35, Low NOx Burner = 61, Flue gas recirculation = 37

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Allowable PM limit(s) from 326 IAC 6-2-2 where $P_t = 0.87 / Q^{0.16}$

Q = total source heat input(in MMBtu/hr) and $Q = 6.7 + 10.04 = 16.74$ MMBtu/hr

allowable PM = $P_t = 0.87 / Q^{0.16} = 0.55$ lbs PM / MMBtu

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